

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

-----X	
CLAUDE V. LEWIS,	: Civil Action No. 1:14-cv-02302(CRK)(KNF)
	:
Plaintiff,	: (ECF Case)
	:
-against-	:
	:
AMERICAN SUGAR REFINING, INC,	: NOTICE OF MOTION TO BIFURCATE
and MEHANDRA RAMPHAL,	: PURSUANT TO FED. R. CIV. P. 42(b)
	:
Defendants.	:
-----X	

PLEASE TAKE NOTICE that the undersigned attorneys for Defendant American Sugar Refining, Inc. and Mehandra Ramphal (the “Defendants”) shall move before the Hon. Claire R. Kelly, U.S.D.J. sitting by designation in the United States District Court for the Southern District of New York in the U.S. Court of International Trade, One Federal Plaza, New York, New York 10278 for an Order granting the Defendants’ Motion to Bifurcate Punitive Damages from the Liability and Compensatory Damages Portion of the Trial pursuant to Fed. R. Civ. P. 42(b); and

PLEASE TAKE FURTHER NOTICE that the Defendants will rely upon the Memorandum of Law and Certification of Michael T. Hensley, Esq., with exhibits, submitted herewith; and

PLEASE TAKE FURTHER NOTICE that a proposed form of order is being submitted herewith; and

PLEASE TAKE FURTHER NOTICE that the Defendants request oral argument.

Dated: New York, New York
March 22, 2018

By: /s/ Michael T. Hensley
Michael T. Hensley, Esq.
BRESSLER, AMERY & ROSS, P.C.
17 State Street, 34th Floor
New York, NY 10004
(212) 425-9300
mhensley@bressler.com
Attorneys for Defendants
American Sugar Refining, Inc.
and Mehandra Ramphal